

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

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| IN RE: | Bankruptcy No. 19-14692-mdc |
| MICHELLE T. SIMMONS, Debtor, | Chapter 13 |
| TOYOTA LEASE TRUST, Movant, | Document No. |
| v. | |
| MICHELLE T. SIMMONS, DANIEL EUGENE SIMMONS, and WILLIAM C. MILLER, Trustee, Respondents. | |

NOTICE OF MOTION, RESPONSE DEADLINE, AND HEARING DATE

Toyota Lease Trust, has filed a Motion for Relief from the Automatic Stay and Co-Debtor Stay with the Court to lift the automatic stay regarding the 2017 Lexus RX350, VIN# 2T2BZMCA7HC081084.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult an attorney.)

1. If you do not want the court to grant the relief sought in the motion or if you want the court to consider your views on the motion, then on or before **Thursday, February 25, 2021**, you or your attorney must do **all** of the following:

(a) file an answer explaining your position at:

Clerk, U.S. Bankruptcy Court
Robert C. Nix Bldg. Suite 201
900 Market Street
Philadelphia, PA 19107

If you mail your answer to the bankruptcy clerk's office for filing, you must mail it early enough so that it will be received on or before the date stated above; and

(b) mail a copy to the movant's attorney:

Keri P. Ebeck, Esquire
Bernstein-Burkley, P.C.
707 Grant Street
Suite 2200, Gulf Tower
Pittsburgh, PA 15219
(412) 456-8112

2. If you or your attorney do not take these steps described in paragraphs 1(a) and 1(b) above and attend the hearing, the court may enter an order granting the relief requested in the motion.

3. A hearing on the motion is scheduled to be held before the Honorable Magdeline D. Coleman on **Tuesday, March 9, 2021**, at **10:30 A.M.** in Courtroom #2, United States Bankruptcy Court, 900 Market Street, Philadelphia, PA 19107.

4. If a copy of the motion is not enclosed, a copy of the motion will be provided to you if you request a copy from the attorney named in paragraph 1(b).

5. You may contact the Bankruptcy Clerk's office at 215-408-2800 to find out whether the hearing has been cancelled because no one filed an answer.

Respectfully submitted,

BERNSTEIN-BURKLEY, P.C.

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Counsel for Toyota Lease Trust

Dated: February 11, 2021